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EBAY INC.

9
10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 BARRY ROSEN,
13

14 Plaintiff,

15 v.

16 EBAY, INC. and DOES 1 through 10,
17

18 Defendants.

Case No. CV13-06801 MWF(Ex)

**DECLARATION OF CARA
BALDWIN IN SUPPORT OF
EBAY'S OPPOSITION TO
MOTION TO VACATE
JUDGMENT**

Honorable Michael W. Fitzgerald

1 I, Cara Baldwin, declare as follows:

2 1. I worked at eBay Inc. ("eBay") from July 2011 to July 2015. From
3 March 2014 to July 2015, I worked as Senior Legal Counsel in the Global
4 Intellectual Property Group. I make the following declaration on personal
5 knowledge except for those statements made on information and belief, and as to
6 those matters I believe them to be true. If called upon to testify to the statements in
7 this Declaration, I could and would competently testify to those facts. I submit this
8 declaration in support of eBay's Opposition to Rosen's Motion to Vacate Judgment.

9 2. In July 2014, I was designated as eBay's Rule 30(b)(6) witness in this
10 litigation. I prepared for this deposition by speaking to various other knowledgeable
11 eBay employees and reviewing certain documents provided to me, including
12 reviewing a data license between eBay and Terapeak. I was deposed by Plaintiff's
13 counsel on August 14, 2014. The answers I provided in my deposition were honest
14 and based on my knowledge and the information provided to me at that time. I had
15 no reason to believe that any of my deposition testimony was in any respect
16 incomplete or inaccurate.

17 3. I also submitted a declaration in support of eBay's Motion for
18 Summary Judgment dated September 4, 2014. All of the statements in that
19 declaration similarly were honest and based on my knowledge and the information
20 that had been provided to me at that time. As with my preceding deposition
21 testimony, I believed all of my answers to be truthful to the best of my knowledge.
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1 I declare under penalty of perjury that the foregoing is true and correct.
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3 Executed on June 26, 2016, in Salt Lake County, Utah
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6 _____
7 Cara Baldwin
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